

Exhibit 2

Bruce Sherald Deposition Transcript

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Case No. 3:22-CV-167-RJC-DCK

ADRIANNA ESTHER BLACKWELL, as Adminitratrix of)
the Estate of D.W.,)

Plaintiffs,)

v.)

GARRY L. MCFADDEN, MECKLENBURG COUNTY, STATE OF)
NORTH CAROLINA, DWIGHT DWAYNE WELLER, TIFFANY)
PARKER WILLIAMS, AKEEM DWAYNE COMAS, HENRIETTA)
SAUNDERS, EDDIE M. BUFFALOE, JR., CHARLES)
MOORE, TAMMY GUESS, KIM COWART, SAMUEL PAGE,)
ANGIE WEBSTER, LIBERTY MUTUAL INSURANCE and)
PLATTE RIVER INSURANCE COMPANY,)

Defendants.)

DEPOSITION OF BRUCE SHERALD

DATE TAKEN: April 24, 2024

TIME BEGAN: 9:55 a.m.

TIME ENDED: 12:18 p.m.

LOCATION: Remote via Zoom

REPORTED BY: Charla Lynch, Court Reporter
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BRUCE SHERALD, after having been first duly sworn,
was examined and testified as follows:

DIRECT EXAMINATION

BY MR. LITTLEJOHN, JR.:

Q. Good morning, Mr. Sherald. How are
you doing?

A. I'm good, sir.

Q. I represent the plaintiff, Adrianna
Blackwell on behalf of the Estate of Demond
Wisonant in this case. Your sworn testimony today
is going to be recorded by a court reporter and
every question that I ask and every question that
you give me will be taken down verbatim. It is
important for you to answer out loud and if
possible try not to nod your head like you may in
casual conversation. If you don't understand any
of these questions, please let me know. You you
can say -- you can ask me to clarify a question or
some part of it. You can ask me to rephrase the
entire question or please break up the question.
Just let me know so that you can better understand
it, so I can make sure to get an accurate answer

1 from you.

2 A. That's fine.

3 Q. The court reporter cannot write
4 everything down that is said if you and I both are
5 talking, so I'm going to wait for you to complete
6 an answer before I hop in, and I would ask that
7 you do the same as well; allow me to ask the
8 question before you attempt to answer.

9 A. Okay.

10 Q. And if possible, please wait for me to
11 finish my question before you start to answer.
12 And if you have any acronyms or lingo -- I know a
13 lot of times, with law enforcement, there may be
14 acronyms and lingo that's specifically used. If
15 you could, please, it would be helpful to the
16 court reporter if you could pause for a moment to
17 explain what that acronym stands for or what that
18 lingo means.

19 A. I can do that.

20 Q. Thank you so much, Mr. Sherald. Are
21 you on any medications that affect your ability to
22 testify truthfully and accurately today?

23 A. No, sir.

24 Q. Did you do anything to prepare for
25 this deposition?

1 A. Just looked at a couple of documents.

2 Q. And without telling me anything that
3 you may have said to Sean, tell me what you did to
4 prepare for this deposition.

5 A. Nothing really.

6 Q. Did you speak to anyone other than
7 Mr. Sean Perrin or the lawyers for the Mecklenburg
8 County Sheriff's Office to prepare for today's
9 deposition?

10 A. I did not.

11 Q. And did you have a chance to review
12 the deposition notice that I served on Mr. Perrin?

13 A. I did.

14 Q. Did you bring any documents with you
15 to today's deposition?

16 A. I did not.

17 Q. And are you aware that you're being
18 asked to testify about an in-custody death at the
19 Mecklenburg County Detention Center on November
20 21st, 2020?

21 A. I am.

22 Q. And are you aware that there is a
23 protective order in this case regarding
24 confidential information that you may disclose
25 today?

1 A. I am.

2 Q. And have you had the chance to review
3 or discuss this order with Mr. Perrin?

4 A. Yes, I have.

5 Q. Okay. And have you agreed to be bound
6 by the terms of that protective order?

7 A. Yes, I do.

8 Q. Thank you so much. Could you please
9 state your name for the record?

10 A. It's Bruce Sherald.

11 Q. And Mr. Sherald, who is your current
12 employer?

13 A. Wells Fargo.

14 Q. When did you start with Wells Fargo?

15 A. September of '21 -- '22. It would be
16 '22. '22, I think.

17 Q. Okay.

18 A. Yeah.

19 Q. And before Wells Fargo, where did you
20 work?

21 A. Mecklenburg County Sheriff's Office.

22 Q. When did you first begin working with
23 the Mecklenburg County Sheriff's Office?

24 A. January of 2020.

25 Q. And what was your title at that time?

1 A. Juvenile detention officer.

2 Q. And what -- where is the specific
3 address or general location of where you worked as
4 a juvenile detention officer?

5 A. It was on Specter Drive at the
6 sheriff's academy. I don't know the exact
7 address.

8 Q. Okay. Typically, do people call that
9 Jail North?

10 A. Yes.

11 Q. Could you explain to me your job
12 duties -- your day-to-day duties as a juvenile
13 detention officer at Jail North?

14 A. Yes. It was supervision of juvenile
15 residents in pods.

16 Q. And were there adult female inmates at
17 Jail North at that time?

18 A. Adult female inmates?

19 Q. Yes, sir.

20 A. No females that I remember. Adult
21 male juveniles, yes. Adult -- no. There was a
22 juvenile -- female juveniles there during that
23 time but not adults.

24 Q. So you were a juvenile detention
25 officer beginning, roughly, around January 2020.

1 When did you stop working as a juvenile detention
2 officer with the Mecklenburg County Sheriff's
3 Office?

4 A. September of '22 -- '21. I've been at
5 Wells Fargo for about two years now so '22, I
6 guess.

7 Q. Okay. Was there a gap in employment
8 or did you do anything after the Mecklenburg
9 County Sheriff's Office and before Wells Fargo?

10 A. No. I was retired at that point.
11 Before Wells Fargo, yes -- I mean before the
12 juvenile detention center, no time between the
13 Sheriff's office and Wells Fargo.

14 Q. Okay. So you left Mecklenburg County
15 Sheriff's Office and went directly to Wells Fargo?

16 A. Correct.

17 Q. During that time you were with the
18 Mecklenburg County Sheriff's Office, do you by
19 chance remember who were your supervisors?

20 A. Yes, it was Sergeant Williams and
21 Captain -- they called her Peaches. I don't
22 remember her name now. Yeah, because she was in
23 and out. I don't remember her name. It will come
24 back to me.

25 Q. When you say Williams, is that Tiffany

1 Parker Williams?

2 A. Yes.

3 Q. And Peaches, was that -- I'm assuming
4 that's a female?

5 A. Yes.

6 Q. Captain Peaches was a female. Did you
7 have any male supervisors?

8 A. Yes, there were -- there was a
9 sergeant there that just came back. I didn't know
10 him very well. And there was Sergeant -- what was
11 his name? I don't remember what his name was now.
12 There were a couple of other sergeants there on
13 that shift with us.

14 Q. Okay. Could you explain to me, I
15 guess, your particular chain of command?

16 A. Yes, it would be Sergeant Williams,
17 the Captain and then Major Youngblood.

18 Q. So did you say Tiffany Parker
19 Williams? Was she a lieutenant or a captain?

20 A. She was a sergeant.

21 Q. Sergeant.

22 A. I think there was a Sergeant Stevenson
23 there, too. Stevenson was a big guy. He was in
24 and out, so I didn't have a whole lot of contact.

25 Q. So could you explain to me how

1 Sergeant Williams supervised you? What was she
2 responsible for while supervising you?

3 A. Yeah, they were responsible for
4 assigning us to the different pods during roll
5 call, and then supervising us and monitoring us
6 during the day on making our checks to make sure
7 we had a hard stream.

8 Q. So you stated a little earlier you
9 were retired before you came on with Mecklenburg
10 County Sheriff's Office. What led you to want to
11 become a juvenile detention officer at the
12 Mecklenburg County Sheriff's Office?

13 A. Well, I spent 21 years in the Army and
14 I'm pretty active. And sitting at home was
15 literally killing me. I wanted to do something,
16 and get back into a uniform, and be a part of a
17 team. I enjoyed working with the kids, to be
18 honest with you. It was just very meaningful work
19 for me.

20 Q. Do you have any children?

21 A. I do. Two girls.

22 Q. So on a daily basis, how often were
23 you having to interact with Sergeant Williams, or
24 Peaches or Youngblood, for example?

25 A. Daily with the Captain and Sergeant

1 Williams. Major Youngblood -- I mean, maybe once
2 or twice a month, maybe, that I can remember.

3 Q. If you had any concerns or you needed
4 to make any reports, who would you go to directly?

5 A. Sergeant Williams or Sergeant
6 Stevenson. One of the two.

7 Q. So as a juvenile detention officer,
8 you stated that you would -- you were responsible
9 for supervising the residents. Did you do any
10 intake with juveniles when they were coming to the
11 facility?

12 A. No.

13 Q. How often would you have to interact
14 with juveniles on a daily basis?

15 A. How often? That was daily, and that
16 was all day and every day.

17 Q. How would you come about interacting
18 with a juvenile inmate who was at that facility?

19 A. I'm not sure I understand the
20 question.

21 Q. When you say you had to interact or
22 you would do it daily, could you just explain some
23 examples that would cause you to have to interact
24 with an inmate?

25 A. If I'm supervising all the juveniles

1 in that particular pod. If I'm working the
2 hallway with transporting them to different areas;
3 maybe to school that day, or medical, or mental
4 health -- wherever they needed to go that day.

5 Q. I know you were at Mecklenburg County
6 Sheriff's Office for a brief stint, but during
7 that time, were you ever disciplined?

8 A. No.

9 Q. Have you ever testified in a
10 deposition?

11 A. No, not that I can remember.

12 Q. Have you ever testified on behalf of
13 Mecklenburg County Sheriff's Office previously?

14 A. No.

15 Q. Have you ever been before the Civil
16 Service Protection Board?

17 A. No.

18 Q. Have you ever been a party to any
19 lawsuit, whether as a plaintiff or a defendant?

20 A. Yes.

21 Q. Were you a plaintiff or a defendant in
22 that case?

23 A. Defendant.

24 Q. Was this prior to or after your
25 employment with Mecklenburg County Sheriff's

1 Office?

2 A. Prior to.

3 Q. Have you ever been convicted of a
4 crime?

5 A. No.

6 Q. In that lawsuit -- was it a criminal
7 matter or a civil?

8 A. Civil.

9 Q. Had you ever been subject to a
10 complaint before the internal affairs at the
11 Mecklenburg County Sheriff's Office?

12 A. No.

13 Q. How did you come to -- excuse me. How
14 did you come to learn about this juvenile -- this
15 juvenile detention officer role at the Mecklenburg
16 County Sheriff's Office?

17 A. I actually attended a job fair with my
18 wife, and I spoke with the -- we were walking
19 through and talking with one of the recruiters.

20 Q. When you say a juvenile detention
21 officer, is that also -- is that the same as a
22 juvenile justice officer?

23 A. I would imagine so. I think the
24 titles, kind of, changed while I was there. The
25 detention officer went to juvenile justice officer

1 so it depends on -- I've seen both terms used.

2 Q. All right. So when you applied for
3 the juvenile justice officer -- juvenile detention
4 officer role, did you do that directly through
5 Mecklenburg County Sheriff's Office or did you do
6 that through another entity?

7 A. It was Mecklenburg County Sheriff's
8 Office.

9 Q. Who were you interviewed by?

10 A. Sergeant Dunn and Sergeant Ross. And
11 then I had to go to a board with Major Youngblood
12 and a couple of other people that -- I don't
13 remember their names.

14 Q. Was your previous service experience
15 relevant in you being selected for the job?

16 A. I think so.

17 Q. Did you have to do basic law
18 enforcement training?

19 A. I did. I went through the Mecklenburg
20 County Sheriff's training academy.

21 Q. Could you explain to me a little bit
22 about what that training academy would entail?

23 A. Oh, a little bit of everything. We
24 got into the policies and procedures, different
25 techniques of deescalation. We went over a lot of

1 the state laws. How to search the resident. How
2 to inspect a cell. It was pretty comprehensive.
3 It didn't -- they didn't leave out that much.

4 Q. And how long did you have to go to the
5 academy for training?

6 A. I think it was six weeks.

7 Q. Did you have to take a test after --
8 after you went through the training?

9 A. Yes, you took tests all the way
10 through and then a final exam at the end.

11 Q. And is that final exam, like,
12 pass-fail, or are you given, like, a number you
13 have to meet?

14 A. We got a number. We had to get at
15 least 70 percent, I think, on the test.

16 Q. And are you allowed to retake the test
17 if you do not get the 70 percent?

18 A. I think you can retest once, if I
19 remember correctly.

20 Q. Do you know whether or not that was --
21 you know whether you can retake it once within a
22 period of a year, six months, two years or
23 anything like that?

24 A. I don't know.

25 Q. Did you pass your first time?

1 A. Yes, I did.

2 Q. Do you remember who conducted those
3 trainings?

4 A. Specific instructors --

5 Q. I'm so sorry, Mr. Sherald. Do you
6 remember any specific instructors?

7 A. There was -- I don't remember the
8 names now. I think one of them may have been
9 Hayes. We had so many different instructors for
10 different -- each time we had a subject, we had a
11 different -- we did have one for the platoon, but
12 I don't remember the name. It was a female
13 sergeant, but I don't remember her name right now.

14 Q. And is the academy located at Jail
15 North, or is it at Jail Central, or somewhere
16 else?

17 A. It's at Jail North.

18 Q. So you had this academy for six weeks.
19 Did you have any other training or courses that
20 you were required to take before you could start?

21 A. Not to my knowledge. Not that I can
22 remember, no.

23 Q. Were you provided with a uniform after
24 you passed the test and you were becoming --

25 A. Yes.

1 Q. Could you describe what the uniform
2 looked like?

3 A. Yeah, they were gray -- gray long
4 sleeved shirt, and gray trousers, and boots and a
5 duty belt.

6 Q. Were you provided with any equipment
7 that you would have to wear on your person -- on
8 your body?

9 A. Yes. Pepper spray container but we
10 couldn't take those into the pods. Flashlight,
11 pouch for your rubber gloves, and the handcuff
12 holster.

13 Q. During your training at the academy,
14 were you all instructed on any medical -- were you
15 all instructed on any medical concerns or anything
16 dealing with medical -- anything medically related
17 that wasn't more so the day-to-day operations of
18 the jail but just medical procedures?

19 A. We got certified in CPR.

20 Q. And did someone from Mecklenburg
21 County Sheriff's Office, you know, I guess,
22 provide that certification, or was there another
23 entity that provided that certification?

24 A. I don't remember who actually
25 conducted it. I think it was somebody from the

1 Mecklenburg County Sheriff's Office, though.

2 Q. Prior to working at the Mecklenburg
3 County Sheriff's Office, had you worked with
4 juveniles before?

5 A. Yes.

6 Q. Could you explain the capacity in
7 which you worked with juveniles?

8 A. Yes, I have -- I have coached AAU
9 basketball, I've been a high school basketball
10 coach, I'm a former Army drill sergeant -- we had
11 17- and 18-year-olds there -- and I was a
12 substitute teacher in a couple of charter schools
13 and Columbus public schools.

14 Q. Did you receive any training with
15 respect to trauma and dealing with delinquents?

16 A. When you say trauma, what do you mean?

17 Q. Did you have any training, whatsoever,
18 about the emotional state of juvenile inmates that
19 may be in your custody?

20 A. If I remember correctly, in terms of
21 just paying attention to them and their moves to
22 see what they're going through. I don't remember,
23 specifically, what the training was.

24 Q. Are there -- before I move on, can you
25 think of any other classes, or seminars, or any

1 other specialized training that is related to jail
2 operations, juvenile inmates or anything of the
3 like?

4 A. Well, I worked as a corrections
5 officer for about nine months in Ohio, but that
6 was a medium security adult facility.

7 Q. Why did you leave that correctional
8 facility?

9 A. I was doing it when I retired from the
10 Army. I was doing it while I finished my degree.
11 I was doing it at night and going to school during
12 the day.

13 Q. What do you have your degree in?
14 Degrees.

15 A. I've got a PHD in biblical preaching,
16 I've got an MBA, I've got a bachelor's degree in
17 organizational management, and an associate degree
18 in public administration.

19 Q. I'm sorry. What in public
20 administration?

21 A. Associate degree.

22 Q. What specific training have you
23 received on recognizing suicide risk in juvenile
24 detainees?

25 A. I remember there was some training on

1 suicide prevention and recognizing it. I don't
2 remember what all the specifics were right now.

3 Q. Okay.

4 A. It was one of the classes that we
5 took.

6 Q. Okay. And how long was that -- how
7 long was that training or how long was that class?

8 A. I do not know. I don't remember.

9 Q. What are some of the warning signs you
10 have been trained to look for?

11 A. Withdrawal. If they looked depressed,
12 not interacting, not coming out of their rooms.
13 After a while, you get to know the kids pretty
14 well, and you know their personalities, and you
15 know, if they have been there any amount of time,
16 how they're doing.

17 Q. Did you have any interaction with
18 Desmond Raye Whisonant?

19 A. I did not. Just through my tours.

20 Q. And again, I know you worked there, in
21 the very least, a year or so. Do you possibly
22 remember what he looked like?

23 A. I remember he was a tall kid.
24 Didn't -- the cell in the lights were off. They
25 had been off when I looked in there, but I could

1 see him clearly. No, the lights weren't off. It
2 was in the morning. It wasn't night. He was a
3 tall kid. He was sitting on the bed. And he was
4 sitting -- one time, when I went around, he was
5 standing up.

6 Q. What was his race?

7 A. African American from what I could
8 tell.

9 Q. And I know you said he was a tall kid.
10 I know you can't give me an exact weight. Was he
11 skinny or was he bigger?

12 A. I didn't think he was overweight or
13 anything. He wasn't skinny. He was a pretty good
14 sized kid from what I remember. You know, I only
15 saw him for seconds.

16 Q. How often did you receive refresher
17 training on recognizing suicide risk?

18 A. There was some periodic updates that
19 we had, but I don't know what the interval was on
20 them.

21 Q. When you say periodic updates, could
22 you explain what you mean by that?

23 A. Yeah, there was certain training we
24 had to complete that was web based. And we had to
25 go online and complete those trainings, but,

1 again, I don't remember, specifically, when those
2 were.

3 Q. When you completed the training
4 online, did you receive a certificate?

5 A. Not a paper one, no. I think it just
6 may have been annotated in our record or our file
7 somewhere. I don't remember getting a certificate
8 for it, no.

9 Q. Did you get, like, a confirmation
10 e-mail?

11 A. Not that I remember. I think it
12 just -- because you logged in with your
13 credentials, so I think it just went to your
14 records.

15 Q. And would Sergeant -- yeah, would
16 Sergeant Williams have to approve, I guess, you
17 know, the completion of any training you did?

18 A. Not to my knowledge. I imagine they
19 got updates on whether we actually did the
20 training or not, but I didn't need her permission
21 to do it. They would tell us, when those
22 trainings came up, that we needed to do it.

23 Q. And who were these trainings conducted
24 by?

25 A. I think they were web based, if I

1 remember correctly.

2 Q. Just so I understand, you said web
3 based. Is that like a webinar or is that --

4 A. It was -- you log in online and you
5 looked at this video and went through the whole --
6 however the class was set up.

7 Q. Did you have to answer questions
8 during the class -- during this online class?

9 A. Yes. If I remember correctly, yes.

10 Q. And were you given any test at the end
11 of these periodic updates?

12 A. If I remember correctly, there were
13 quizzes along the way until you got to the end.

14 Q. Did you have to get a certain score
15 for those quizzes?

16 A. Yes, but I don't remember what it was.
17 I know I passed them all the first time, so I
18 don't --

19 Q. And your chain of command would be
20 notified that you took or -- if you did these
21 periodic updates, that you passed these quizzes?

22 A. I would imagine so. I don't remember
23 ever getting any feedback one way or the other.

24 Q. Did you ever receive any training from
25 anyone in your chain of command?

1 A. Training?

2 Q. Hands-on.

3 A. I'm not sure -- hands-on how?

4 Q. Inservice training.

5 A. No. Usually, if we had any training,
6 somebody came in and did it as far as I can
7 remember.

8 Q. What were some of the differences
9 between -- other than the inmates, what would you
10 say are some of the differences in training that
11 you received from Mecklenburg County Sheriff's
12 Office and the correctional facility you had
13 worked at in Ohio?

14 A. Well, in the contact, in how you
15 interact with the residents. In the medium
16 security prison -- those guys were convicted. In
17 the juvenile facility, it was more relational --
18 building relationships with the kids than being
19 authoritative. You have to be firm and very
20 consistent with them, but you're talking about
21 adults and juveniles. It's totally different
22 personalities and a totally different culture.

23 The guys in prison -- they're in
24 prison. They know they're -- they know where they
25 are and where they stand. In the juvenile -- you

1 know, a lot of them are afraid when they come in
2 there. They're nervous and, really, you just try
3 to settle them down and relax and be okay because
4 they want to act like they're tough, but most of
5 them are pretty scared when they get in there.
6 That was the biggest difference in how you
7 interacted with them. I would not interact with
8 the medium security guys nearly as much as I would
9 with the juvenile.

10 Q. Would you say the trainings that you
11 did in Ohio, at the correctional facility, and the
12 trainings that you did with juveniles -- that
13 those were pretty consistent?

14 A. Absolutely. I thought the training
15 was excellent. It was some of the best training I
16 ever received.

17 Q. If you don't mind, could you expound
18 on the differences between an adult inmate and a
19 juvenile inmate and how you would need to interact
20 with them?

21 A. Well, adult inmates -- they want to
22 manipulate you a lot of times. They're on a
23 mission. They've got a cause. Juveniles --
24 they're just trying to get through the day. It's
25 more or less having a conversation with them and

1 building a rapport with the juveniles. Where with
2 the adults -- you knew they were up to something.
3 And the juveniles not so much. Occasionally, but
4 most of the time they just wanted somebody to
5 listen to them.

6 Q. When you were at the previous
7 correctional facility, did you recall any
8 incidents of an inmate suicide or a detainee
9 suicide?

10 A. No. No.

11 Q. What resources -- when you were with
12 the Mecklenburg County Sheriff's Office, what
13 resources were available to you to help you
14 recognize suicide risk in detainees?

15 A. I think the way the whole program is
16 set up -- because you're always paying attention.
17 Always interacting. So I think that it -- just by
18 the way that you did everything, you could not
19 help but interact with them and pay attention to
20 what was going on with them. Because if you see a
21 mood change, it could change the whole pod.

22 Q. And you stated a little earlier you
23 had nothing to do with intake; is that correct?

24 A. That is correct.

25 Q. Okay. So you would not have had the

1 opportunity to -- for new juveniles that are
2 coming to the facility, you would not have had the
3 opportunity to make any assessment whatsoever?

4 A. No. No.

5 Q. Could you walk me through how you
6 typically learned that a juvenile is at risk for
7 suicide?

8 A. During roll call, they'll give us a
9 list of names, in the pod we're assigned to, who
10 is on suicide watch and for how long.

11 Q. Were you aware who was on suicide
12 watch on November 21st, 2020?

13 A. In my pod, I do not remember. I don't
14 think I had any juvenile watches in my pod that
15 day.

16 Q. Can you possibly remember what pod you
17 were in?

18 A. I want to say --

19 Q. Let me ask another way.

20 A. There's nine. I think I was in six.
21 Weller was in five. Either six or seven because
22 the numbers were not straight across so I don't
23 remember which one. I think it was HI-6.

24 Q. Weller was in pod five?

25 A. I think he was in HI-5, yeah.

1 Q. Okay. And I was wondering this, what
2 does "HI" mean?

3 A. That's what was on the door.

4 Q. Okay. Okay. So how many juveniles
5 did you have in your particular pod? I won't say
6 a number because you don't recall. But how many
7 juveniles did you have in your pod?

8 A. Maybe six that day.

9 Q. What was the most you would have in a
10 pod?

11 A. Eight.

12 Q. And on the day of November 21st, 2020,
13 a date that Desmond Whisonant committed suicide,
14 did you have to go to Weller's pod?

15 A. Yes. I had provided his break. We
16 broke each other that day.

17 Q. Did you know that you were going to
18 relieve him for his lunch break at roll call?

19 A. Yes.

20 Q. And you said earlier you do not recall
21 which inmates were on suicide watch?

22 A. In my pod, no. I think in Weller's
23 pod he told me he had one guy or maybe two that
24 were on suicide watch. That's why I --

25 Q. Did you know which particular cells

1 those inmates were in?

2 A. Yes, he told me which ones. I think
3 it was four or five.

4 Q. How do you become aware that an inmate
5 is on suicide alert?

6 A. I don't know if there's a difference
7 between suicide alert and suicide watch. I think
8 those terms can be used interchangeably. If they
9 were on suicide alert, we would maybe put them in
10 the turtle suit, if I remember correctly. We took
11 all of their clothes from them and they would be
12 in the turtle suit if they were on alert. And on
13 a watch, they were just in their regular clothes
14 provided by the Sheriff's office.

15 Q. Do you recall what, if any, suicide
16 alert or watch Desmond Whisonant was on?

17 A. I think I remember him being on
18 suicide watch but I -- you know, it was just a
19 normal day so that wasn't anything unusual.

20 Q. In your pod, for example -- pods --
21 you think it's six or seven. But in your pod,
22 while you were with the Mecklenburg County
23 Sheriff's Office, would a juvenile who is on
24 suicide alert or suicide watch be placed in a
25 special room?

1 A. No. They were in their regular cells.

2 Q. And do the cells have a sprinkler
3 system in them?

4 A. Yes.

5 Q. Do the cells have a smoke detector in
6 them?

7 A. Yes. As far as I know, yes.

8 Q. What does it mean to directly observe
9 an inmate?

10 A. You put eyes on them. You look at
11 them and see if they're breathing. Make sure
12 they're still alive.

13 Q. What does it mean if a juvenile inmate
14 is listed as being on a close observation watch?

15 A. Then the timeframe for checking on
16 them is decreased, and you check more often.

17 Q. Can you recall how often you check on
18 someone who is on a close observation?

19 A. No, I don't because I -- I don't think
20 I had anybody on close observation that I can
21 remember.

22 Q. What is the difference between close
23 observation and constant supervision if an inmate
24 is listed as he needs to be watched on a constant
25 supervision basis?

1 A. It means you need to check on them in
2 whatever the described timeframe is. I don't
3 recall -- I think it's every 10 minutes we would
4 check if -- they were on suicide watch the first
5 24 hours when they came in. Every 10 minutes, on
6 a regular basis, you would check on them. And
7 regular supervision is you just watching them in
8 normal activities throughout the day.

9 Q. So you have close observation,
10 constant supervision, and then you said regular
11 observation?

12 A. Yeah. Close supervision for me was
13 when we were playing cards, or playing basketball,
14 or doing the room inspections. And then, if I'm
15 at the podium -- to me that's -- that's just
16 regular observation.

17 Q. In your pod, were juvenile inmates
18 allowed to be in their cell alone?

19 A. Yes. Yes.

20 Q. Do they keep the door closed?

21 A. Yes.

22 Q. Could you explain to me what the
23 outside of every individual cell looks like?

24 A. The outside?

25 Q. Yes, sir.

1 A. It depends on the pod, but some of the
2 doors would have a feeding opening. But it's just
3 a metal door with a window that you can look in
4 and check on them and you can see everything in
5 there. It's just a big, heavy steel door on the
6 outside of the pod.

7 Q. And can you see directly into the cell
8 from that window or are the rooms -- or is it
9 like -- are the cells pretty big so you need to
10 get close to it?

11 A. They're small. You can look in and
12 see everything in that cell.

13 Q. If you were directly observing an
14 inmate in your pod, you know, would that require
15 you to stop in front of every door?

16 A. No, not necessarily. Because after
17 you do it so long, you know, as soon as that
18 window comes, you look in and you know what you're
19 looking for and you keep moving. It depends on
20 the kid. Sometimes I might stop and talk to them.
21 But most of the time -- in the morning, when
22 they're still asleep, you just walk by and make
23 sure they're still breathing and keep moving.

24 Q. How long would an average pod tour
25 take?

1 A. About a minute, two minutes at the
2 most. The pods aren't very big.

3 Q. Okay. And when you do a pod tour, how
4 do you -- do you do anything prior to beginning a
5 pod tour?

6
7 A. Yeah, you annotate, "Pod tour starts"
8 in your log, then you go do your pod tour, and you
9 come back. If you notice anything, you put it in
10 the thing and then you put, "Pod tour ends." The
11 start and the end of the pod tour -- you annotate
12 it.

13 Q. Did you have to press any buttons?

14 A. Yes, there are buttons along the wall
15 that, when you start the tour -- you hit it on the
16 computer saying the tour begins, and then the
17 lights would all turn red. And as you pushed
18 them, they went off.

19 Q. Got it. Got it. Were you required to
20 touch the button during every pod tour?

21 A. Yes.

22 Q. How many buttons were there?

23 A. I think there were --

24 Q. Just in your pod.

25 A. I think there were six.

1 Q. Okay. If you can recall, how were
2 those six buttons situated in the pod?

3 A. If I'm sitting at the podium, there's
4 one behind the podium, one on the wall, one in the
5 middle, one in the back -- so it might have been
6 seven because there was one on the end -- yeah,
7 might have been seven. May have been seven of
8 them.

9 Q. What specific training did you receive
10 on preventative measures for suicide in
11 detainees?

12 A. Whatever training we received during
13 our academy training.

14 Q. Is that it?

15 A. Yes.

16 Q. If you can recall, Mr. Sherald, what
17 are some of the preventative measures you have
18 been trained to take?

19 A. If I remember -- to engage them, talk
20 to them, make sure they're -- they're responsive.
21 Mainly, just make sure you're paying attention to
22 watching what they were doing.

23 Q. How long were you in or on
24 Mr. Weller's pod on November 21st, 2020?

25 A. Our breaks are 15 minutes. So I went

1 in just before then so he could go on his break,
2 and he would get back, and I would go on mine.

3 Q. Did you engage with any of the
4 juveniles in that pod during that 15 minutes?

5 A. They were all locked down, so I may
6 have talked to somebody in the door, maybe in
7 passing, but not really.

8 Q. Do you feel that your training
9 adequately prepared you to take preventative
10 measures for suicide in detainees?

11 A. I do.

12 Q. Are you familiar with the Mecklenburg
13 County Sheriff's Office policies on suicide
14 prevention?

15 A. I was. I'm not too familiar right now
16 but I was at that point.

17 Q. Were there -- were there different
18 policies for the Mecklenburg County Sheriff's
19 Office and with respect to the juvenile inmates?
20 Were there two sets of policies on suicide
21 prevention, specifically?

22 A. Not that I can remember. Not that I
23 can recall off the top of my head, no.

24 Q. What are some of the key aspects of
25 the suicide prevention policy that you were aware

1 of? Can you recall?

2 MR. PERRIN: I'm going to object to
3 the form. You can answer that.

4 THE WITNESS: I think the biggest
5 thing was vigilance. Making sure you were
6 checking on them.

7 BY MR. LITTLEJOHN, JR:

8 Q. Do you feel that the policies were
9 clear and easy to follow?

10 A. Yes.

11 Q. Do you feel that these policies were
12 effective in preventing suicide in detainees?

13 A. Yes. Up to that point, yes.

14 Q. Do you feel as if the suicide policies
15 were adequate enough on November 21st, 2020?

16 A. I do.

17 Q. Who all would be present at roll call?

18 A. Everybody on shift that day.

19 Q. Were you working on the day before,
20 November 20th, 2020?

21 A. I do not remember if that was -- if I
22 was coming on that day or if that was day number
23 two. I don't remember, honestly.

24 Q. How many juvenile detention officers
25 would be assigned, you know, to a particular pod

1 for a day? So for example -- yeah.

2 A. One per pod.

3 Q. And how many hours would you have to
4 typically work that pod?

5 A. The entire shift. 12 hours.

6 Q. So what information are you provided
7 on juvenile inmates at the roll call?

8 A. If there were any fights, or if they
9 had any particular issues or illnesses, and who
10 all -- how many new people were in there, and who
11 was on suicide watch.

12 Q. What did Weller tell you about the
13 juvenile inmates in his pod when you relieved him
14 for lunch?

15 A. He just said, "Everybody is good."
16 He's got -- I've got one suicide watch or two -- I
17 don't remember if one or two in there -- and he'll
18 be back. I had worked with Weller before so it's
19 pretty standard for what we did.

20 Q. Did he give you any more information
21 about the particular inmates other than them being
22 on a watch or alert?

23 A. No. I was familiar with the other
24 residents in there except the new people. The
25 other ones -- I knew them. I had been in that pod

1 before, myself, so I was familiar with them.

2 Q. So you've worked in pod five before?

3 A. Correct.

4 Q. And does pod four have any suicide
5 specific cells that inmates who are suicidal would
6 be assigned to?

7 A. No. If we can -- I know a lot of them
8 like to do that. We try to put them -- if the
9 cells are open -- in the ones closest to the
10 podium. If there was nobody else in there. If
11 they weren't occupied, we would try to put them in
12 there but it doesn't always work out.

13 Q. When you say podium, could you explain
14 what you mean the podium?

15 A. It's a podium with your computer, your
16 phone, and all your other equipment and supplies,
17 and it's at the head of the pod where you can
18 stand and see the whole pod.

19 Q. And was that in the same, I guess --
20 was that in the same area as the actual pod, or
21 was it situated outside of the pod where you would
22 go?

23 A. It's in the pod.

24 Q. Could you tell me a little bit about
25 the cells in pod five? What would you typically

1 find in a cell as far as fixtures and furniture?

2 A. A sink, a metal mirror. That's about
3 it.

4 Q. Are inmates -- are juvenile inmates
5 given suicide resistant blankets?

6 A. Not that I can remember, no. They
7 just had regular blankets.

8 Q. Were all juvenile inmates given pen
9 and paper or pencil and paper?

10 A. Well, we give them pencils but we get
11 them back from them. If they ask for a pencil, we
12 give them one but we get them back. So yes. The
13 answer is yes.

14 Q. Would they be allowed to have pencils
15 and pens and paper in their cell by themselves?

16 A. Yes.

17 Q. And were inmates that were on either
18 suicide watch and suicide alert also allowed to
19 have pens and paper or pencils?

20 A. I honestly don't remember. I don't
21 remember anybody being on suicide watch ever
22 asking for a pencil. We give them reading
23 material sometimes, but I don't remember if we
24 gave them pencils or not, to be honest with you.

25 Q. What did you observe from Desmond

1 Whisonant that made you think that he could be at
2 risk for suicide?

3 A. There was nothing about him that made
4 me think he was at risk for suicide except he was
5 new. There was nothing remarkable about him that
6 I could see. He was another scared kid in the
7 jail.

8 Q. And at that time, had you known how
9 long he had been in that particular pod?

10 A. I did not, no.

11 Q. Did you know whether or not he was
12 transferred from another facility?

13 A. I did not.

14 Q. Did you know if he had had any
15 previous suicide attempts?

16 A. I do not know.

17 Q. Would you have known that he was not
18 to previously be provided bed sheets?

19 A. If it was, I would have been told
20 that.

21 Q. Would you have known that he was
22 previously not to be provided with pencils or
23 sharp objects?

24 A. I would have -- someone would have
25 told me if that was the case.

1 Q. Would you have known that he had
2 previously expressed fleeting suicidal ideations?

3 A. No. That was not communicated to me.

4 Q. Should that have been?

5 MR. PERRIN: Objection to form. You
6 can answer.

7 THE WITNESS: I don't know what
8 difference it would have made.

9 BY MR. LITTLEJOHN, JR.:

10 Q. Did you communicate with any staff
11 members about Desmond Wisonat's potential risk for
12 suicide?

13 A. I did not.

14 Q. When did you learn that Desmond
15 Whisonant committed suicide?

16 A. After the lockdown, I heard the
17 screaming next door, and they locked -- we locked
18 everybody down, and then they give everybody a
19 call saying what happened. I didn't know who it
20 was. I didn't know which -- they said --

21 Q. Were the pods situated next to each
22 other or were they on, like, floors?

23 A. We were all on one floor.

24 Q. Were you called to go to pod five?

25 A. No, I was not. I stayed in my pod.

1 Q. Who was the first person you talked to
2 after the cell -- the cell was put on lockdown?

3 A. When hallway called to tell us about
4 the lockdown, they said that somebody -- I don't
5 remember who was on the hallway that day.

6 Q. Did you talk with Sergeant Williams
7 afterwards?

8 A. She just came by and just told us what
9 happened.

10 Q. Were you asked to give a statement?

11 A. I believe I was. If I remember
12 correctly, I was.

13 Q. Did you give a statement to the
14 Mecklenburg County Sheriff's Office?

15 A. I'm pretty sure I did, but I'm not 100
16 percent sure. I believe I did because I would --
17 I broke him that day. I imagine I would have done
18 a statement.

19 Q. Do you think that statement would have
20 been written or verbal?

21 A. It would have been written.

22 Q. So there should be a written statement
23 after the -- after the lockdown, that you provided
24 to the Sheriff's office?

25 A. Yes. If I did one, then, yeah, there

1 would be -- it would be in there.

2 Q. Did you provide any statement to any
3 other governmental agency, state or federal?

4 A. No, I haven't talked to anybody else.

5 Q. You did not talk to the State Bureau
6 of Investigation?

7 A. No.

8 Q. Who else conducted pod tours on
9 November 21st, 2020, in pod five, other than
10 yourself and Weller?

11 A. I am -- I wouldn't know. My door is
12 closed. I can't see in that pod. If anybody else
13 came in --

14 Q. You stated a little earlier about how
15 you go about logging, I guess, your pods. Could
16 you explain any written logs that you would
17 provide for your juvenile inmates on the pod?

18 A. The regular log that we had and then,
19 if anyone was on suicide watch, there's an
20 additional document that you annotate on when you
21 check the suicide watch.

22 Q. And then the buttons you're pressing
23 also create a log?

24 A. Yes. Yes. We never got to see those
25 logs. We never saw it but I imagine the sergeants

1 probably could.

2 Q. And so -- if you don't know you can
3 just say that, but with the buttons on the wall,
4 do you believe it is clocking every time that
5 you're hitting a button or when you make a
6 complete tour?

7 A. Well, the tour would -- it wouldn't
8 show the tour complete until you hit all the
9 buttons. If you missed a button, it would show up
10 on the computer of the tour not being done.

11 Q. So I just want to make sure I'm
12 hearing you right. You said there was a special
13 form you have to do for suicide watch or suicide
14 alert?

15 A. Yeah. There was -- it was a purple
16 form. You just annotated every 10 minutes for
17 them because the other pod times were different.

18 Q. Who would sign off on the purple form?

19 A. The juvenile -- the officer in the
20 pod.

21 Q. And would you initial it or would you
22 sign it?

23 A. I believe I initialled it.

24 Q. Would your supervisor also have to
25 initial it?

1 A. Somebody would sign it when the person
2 came off. And if they came around to do a pod
3 tour, I think they may have annotated on that same
4 form.

5 Q. What kind of things would a supervisor
6 typically annotate on that form?

7 A. "Conducted pod tour. Everything is
8 safe and secure" or whatever they found -- if they
9 found any discrepancies. Anything in there.

10 Q. So would Sergeant Williams typically
11 go back behind you after you had done a pod tour?
12 Would sergeant do her own pod tour?

13 A. She would do her own. Her pod tours
14 were totally independent of mine.

15 Q. So would this happen every day?

16 A. Yes.

17 Q. And so the supervisors used the same
18 purple document -- purple form that you would
19 write on, or would they get another form to
20 complete?

21 A. I believe they used the same form. As
22 far as I can remember, it was the same form.

23 Q. And did a mental health clinician have
24 to also review that form?

25 A. I think that's who signed off on it to

1 take them off of suicide watch, if I'm not
2 mistaken. I think mental health had to sign off
3 on it. I know somebody had to sign off on it.
4 Now that you mention it, I think it was the mental
5 health doctor that had to sign off saying they
6 were off suicide watch.

7 Q. On November 21st, 2020, did all the
8 pods have the same supervisor?

9 A. Yes.

10 Q. So on November 21st, 2020, who was the
11 pod supervisor?

12 A. Now, when you say supervisor -- I'm
13 talking about Sergeant Williams as a supervisor.
14 Are you talking about -- every pod has its
15 own juvenile justice officer in it.

16 Q. Correct. Yes, sir. So on November
17 21st, you stated earlier, you were in a pod?

18 A. Correct.

19 Q. Your pod supervisor was Sergeant
20 Williams?

21 A. Well, yes. I'm the pod supervisor
22 when I'm in there. Sergeant Williams is the
23 supervisor. Maybe it's just --

24 Q. Sorry about that. Got it. So for
25 Weller's pod five, Sergeant Williams would have

1 been supervising his tours, right?

2 A. Correct.

3 Q. Does Sergeant Williams have any
4 communication with you before you start a pod tour
5 or after you conclude a pod tour?

6 A. No. Because, usually, I'm -- the only
7 person who is in there is me. When she comes to
8 do her thing, she'll look at my log and see that I
9 had been doing my tours.

10 Q. Do you know Quaderah Carver who works
11 at the Mecklenburg County Sheriff's Office?

12 A. Vaguely. She hadn't been there very
13 long. I remember the name. I don't know what her
14 face looks like now. I remember the name. She
15 had been working with the --

16 Q. Did you take any action, on November
17 21st, 2020, to mitigate Desmond Whisonant
18 committing suicide?

19 MR. PERRIN: Objection to the form.
20 You can answer that.

21 THE WITNESS: I conducted the tours,
22 but -- yeah, I did my job. I conducted tours but,
23 no, I don't think I did anything --

24 BY MR. LITTLEJOHN, JR.:

25 Q. Did you ever speak, one on one, as you

1 and I are doing today -- did you ever speak with
2 Desmond Whisonant?

3 A. No.

4 Q. Do the cells have any closed circuit
5 monitoring in them?

6 A. Inside the cells?

7 Q. Yes, sir.

8 A. No.

9 Q. Did the correctional facility you
10 worked at in Ohio have that?

11 A. No. No.

12 Q. You stated that the cells have light
13 switches in them?

14 A. No -- yeah, they do, but we have a
15 main switch. We can give them the ability to turn
16 their lights off and on.

17 Q. What specific questions did you ask
18 Weller about the suicidal -- the inmates that were
19 put on either watch or alert of which Weller was
20 responsible for in that pod?

21 A. I just asked him -- I didn't ask him
22 anything about it really, but just which one --
23 which cell is the suicide watch and he was
24 confirming that.

25 Q. Do you do anything special when it

1 comes to -- do you do anything different as
2 opposed to juvenile inmates who are not on suicide
3 watch or alert when it comes to directly observing
4 them?

5 A. No. I -- I do it all the same.

6 Q. So you watch a potential suicidal
7 juvenile inmate the same -- observe a suicidal
8 inmate the same as an inmate who is not placed on
9 any particular suicide watch or alert?

10 A. Yes, the only difference is the
11 timeframe that you check on them.

12 Q. Did you do staggered observations?

13 A. I did.

14 Q. Okay. So would you leave the podium
15 to go, specifically, check one particular cell
16 that may have a suicide alert or watch juvenile
17 inmate?

18 A. Yes.

19 Q. So when you went to directly observe
20 an inmate that was on suicide watch or suicide
21 alert, because of the staggered intervals, you
22 were going specifically to that cell?

23 A. Correct.

24 Q. Can you recall what the Mecklenburg
25 County Sheriff's Office policies or specific

1 requirements were for direct observation?

2 A. I don't remember off the top of my
3 head, to be honest with you.

4 Q. So tell me everything that you did to
5 ensure that the juvenile inmates on your
6 particular pod were being directly observed by
7 you.

8 A. Just follow the policies and do the
9 tours. If you do the tours, you can't help but
10 see -- if you're doing your job, it's almost
11 impossible not to observe them because you have to
12 look in there and visually see them there.

13 Q. Would any -- would anyone other than
14 yourself have logged what you saw, at the time you
15 saw it, on the purple form?

16 A. No.

17 Q. What would you typically -- what are
18 the particular annotations you may write down,
19 under observations or comments, on the purple
20 form?

21 A. I usually put what the juvenile is
22 doing. "Juvenile is sitting on bench. Juvenile
23 is standing in cell." Whatever they're doing in
24 there is what I would put on the form. "Juvenile
25 asleep." Whatever was going on in that cell is

1 what I put on the form.

2 Q. What does it mean for a juvenile
3 inmate to be safe and secure?

4 A. That they're alive, and breathing and
5 functioning normally. Not getting into a fight,
6 not bleeding.

7 Q. Is there any fixed circuit
8 surveillance camera in the pod you were working on
9 November 21st, 2020?

10 A. Yes, there's video -- there's cameras
11 in every pod.

12 Q. Do you know where those cameras are
13 situated?

14 A. Yes.

15 Q. How many cameras are there?

16 A. Two or three, I think.

17 Q. And where, typically, would they be
18 located in a pod? What are they trying to
19 capture, I guess, is more so what I'm trying to
20 understand?

21 A. You can see all the doors in the pod
22 and you can see the open floor in the pod. And
23 there's a camera out on the basketball court. So
24 four -- probably four cameras there. I forgot
25 about the basketball court.

1 Q. Are you able to -- when you were with
2 the Mecklenburg County Sheriff's Office, could you
3 access those cameras, yourself, and watch those?

4 A. No.

5 Q. Had you -- have you seen any footage
6 from -- video footage from any fixed surveillance
7 from November 21st, 2020?

8 A. Just what I saw here this morning.

9 Q. Could you explain what you saw this
10 morning?

11 A. I saw myself doing my -- doing checks.

12 Q. Just bear with me one moment, Mr.
13 Sherald

14 A. You're fine.

15 Q. So you previously reviewed video
16 camera footage from your cell checks on pod five,
17 correct?

18 A. Yes.

19 Q. I'm going to be showing you right now
20 what I'm including as Exhibit A -- Plaintiff's
21 Exhibit A. Does this area look familiar to you?

22 A. Yes, it looks like a pod.

23 (Whereupon Exhibit A was marked for
24 identification and is attached hereto.)

25 BY MR. LITTLEJOHN, JR.:

1 Q. And is the date at the top right-hand
2 corner November 21st, 2020?

3 A. Yep.

4 Q. And is the time at the top 12:16
5 p.m.?

6 A. Yes, it is.

7 (Video playing.)

8 BY MR. LITTLEJOHN, JR.:

9 Q. So I'm going to show you -- just for
10 purposes of authentication, could you tell me if
11 the person who just popped up at the bottom of
12 that screen -- is that you, Mr. Sherald?

13 A. Looks like it, yes.

14 Q. And is this your pod tour on November
15 21st, 2020?

16 A. Is this my pod or pod five?

17 Q. No, sir. Are you conducting a pod
18 tour in this image?

19 A. Yes. Yes.

20 Q. And I can play it just so you can see
21 it from the front and back. I know Sheriff
22 McFadden has a bald head as well. Just making
23 sure that's not him.

24 So Mr. Sherald, did that clip I just
25 showed -- does that accurately depict you on

1 November 21st, 2020?

2 A. Yes.

3 Q. And during that time, were you on pod
4 five?

5 A. Yes. I probably had the door open
6 from my pod going back and forth, yes.

7 Q. And as you can see at the top right --
8 I'm stopping the video, but it is 12:17:16 p.m.?

9 A. Uh-huh.

10 Q. So when you said that you were going
11 back and forth, were you having to observe -- were
12 you -- when you relieved Officer Weller, were you
13 still responsible for the pod that you were
14 working earlier that day? Were you doing both?

15 A. Yes.

16 Q. Did you have any inmates on suicidal
17 watch in your pod?

18 A. Not that I can remember.

19 Q. And on the image that I'm currently
20 showing you, do you recall which cell was Desmond
21 Wisonat's?

22 A. Yeah, I believe it was the third from
23 the back.

24 Q. When you say third from the back --

25 A. On the left-hand side there. All the

1 way where the door is going out to the basketball
2 court --

3 Q. Yes, sir?

4 A. Third door from there.

5 Q. On the left side or the right side?

6 A. Left side.

7 Q. Okay. Are you referring to this cell
8 right here?

9 A. Yes.

10 Q. The left side?

11 A. Yes.

12 Q. Okay. Do you know how long you
13 relieved Officer Weller on November 21st, 2020?

14 A. Our breaks are 15 minutes and Weller
15 always comes back on time.

16 Q. You said a little earlier there was a
17 purple form, there was a log notebook, there was a
18 button, and then there was the video. Are there
19 any other ways, other than the four ways I just
20 named, to validate logs of tours or observations?
21 Am I missing anything?

22 A. I don't think you are. I think you
23 got everything.

24 Q. Did you complete a purple form when
25 you relieved Officer Weller on his pod?

1 A. If there was one in there, I did.

2 Q. I'm showing you right now what I'm
3 marking as Plaintiff's Exhibit B. Does this
4 document look familiar to you?

5 A. Yes.

6 (Whereupon Exhibit B was marked for
7 identification and is attached hereto.)

8 BY MR. LITTLEJOHN, JR.:

9 Q. Could you explain to me what this
10 document is?

11 A. Yes, it's the log from the pod where
12 you log your -- everything that goes on in the pod
13 including your checks.

14 Q. And did you complete this document on
15 November 21st, 2020?

16 A. I did.

17 Q. And is your handwriting on this
18 document?

19 A. Yes, it is.

20 Q. Could you tell me right now where your
21 handwriting is on this document?

22 A. Yes. At 12:19, down to 12:49.

23 Q. I can --

24 A. Yep, 12:49. I think I put 14:49. I
25 don't know why I did that but that's 12:49.

1 Q. So roughly 30 minutes? From 12:19 to
2 12:49?

3 A. Yeah. That was at lunch. So we get
4 30 minutes for lunch and 15 minutes for the
5 breaks. So 30 minutes would have been right.

6 Q. Which one was Officer Weller on?

7 A. Which --

8 Q. Which break? I'm sorry.

9 A. That had to be the lunch break at
10 12:00 because we take -- the morning break is
11 around anywhere from 9:30 to 10:30. Somewhere in
12 there, I think. Depends on how many people we
13 have on the hallway.

14 Q. So this says 12:19 p.m. So you stated
15 that if a log was done or if there was purple
16 form -- if there was a purple form for that pod,
17 you would have also completed that, correct?

18 A. Correct.

19 Q. And do you recall right now whether or
20 not you did a form for Desmond Whisonant that day?

21 A. I do not remember. If there was one
22 in there, then I did it. It goes along with the
23 pod tours. If we had the purple forms, then,
24 yeah, I would have filled one --

25 Q. And no one else would have made note

1 of your record or your log -- no one else would
2 have noted Mr. Bruce Sherald's log of Desmond
3 Whisonant?

4 MR. PERRIN: Object to form. You can
5 answer.

6 THE WITNESS: Not to my knowledge.

7 BY MR. LITTLEJOHN, JR.:

8 Q. So I'm showing you another document
9 that I'm labeling as Plaintiff's Exhibit C. Does
10 this document look familiar?

11 A. Yep.

12 (Whereupon Exhibit C was marked for
13 identification and is attached hereto.)

14 MR. LITTLEJOHN, JR.: Okay. And as
15 you can see, it starts around 13 -- it looks like
16 13:55 and he arrives to Mecklenburg County
17 Sheriff's Office. And I see staff initials for
18 Quaderah Carver. So I'm going to scroll down to
19 the time where you were working.

20 Q. At 12:19, in your previous log, you
21 had noted your observation and pod tour. Are your
22 initials on this document?

23 A. No.

24 Q. Did you observe Desmond Whisonant at
25 12:15 p.m. on November 21st, 2020?

1 A. Whatever the time was on the log that
2 I put on there was the time I observed him.

3 Q. So this is the purple form that you
4 were stating that you also had to complete. And
5 you had stated a little earlier that if one had
6 been completed, you would have done it?

7 A. This isn't the form I was talking
8 about, though. I don't know what this one is.

9 Q. Can you see the document I'm sharing
10 right now on my screen?

11 A. Yes.

12 Q. Does this document look familiar?

13 A. Yes, this is the form I was talking
14 about.

15 Q. And it's just because the color is
16 purple, correct?

17 A. Correct.

18 Q. Have you ever completed one of these
19 forms?

20 A. I have.

21 Q. What training did you receive about
22 this particular form?

23 A. I don't remember any specific training
24 except what we probably did in training. I
25 remember that --

1 Q. So the Mecklenburg County Sheriff's
2 Office showed you how to complete this form?

3 A. Yes.

4 Q. So I know, on the top of this form, it
5 says, "This form shall be printed on lavender
6 purple paper."

7 A. Yes.

8 Q. Could you read note two for me,
9 please?

10 A. Oh, "Document observations at
11 intervals that do not exceed 10 minutes."

12 Q. And what is your understanding of note
13 two?

14 A. That you can't go over 10 minutes
15 between checks, and it should be at regular
16 intervals.

17 Q. What could happen if you did not log
18 in this 10 minutes?

19 A. I imagine you would get written up.
20 I'm not really sure of --

21 Q. How would someone know?

22 A. How would someone know? Well, I'm
23 sure there's video when you're annotating on your
24 log.

25 Q. And should this log be consistent with

1 the the other log notebook that you were referring
2 to earlier that --

3 A. No.

4 Q. Why not?

5 A. The time difference. The part two is
6 for the people not on suicide watch that is
7 longer. This one is every 10 minutes. The other
8 one, I think, is every 20.

9 Q. So you had stated a little earlier
10 that these were staggered observations, right?

11 A. Correct.

12 Q. So you would go directly to the
13 suicidal inmate or the inmate that was placed on
14 alert or watch that is indicated on this form?

15 A. (No audible response.)

16 Q. But you do -- you know, in your
17 day-to-day, as a juvenile detention officer, this
18 is the document that you would complete?

19 A. Yes.

20 Q. Okay. So I'm going to go back to the
21 document I showed you as Plaintiff's Exhibit B.

22 A. Okay.

23 Q. With the exception of the color of the
24 paper, is this not the same document?

25 A. It looks like it.

1 Q. Does your time logged from November
2 21st, 2020, appear on this document?

3 A. No, it does not.

4 Q. Thank you.

5 (Marilyn Porter joined the
6 deposition.)

7 BY MR. LITTLEJOHN, JR.:

8 Q. So to your knowledge, was Desmond
9 Whisonant housed in the same cell as inmates who
10 were not on suicide watch or alert?

11 A. In the same cell, no. He was in a
12 cell by himself.

13 Q. Same type of cell?

14 A. Oh, yes. All the cells -- all the
15 pods are the same in there.

16 Q. Do you know or can you recall if
17 Desmond was under close supervision -- under close
18 observation or constant supervision?

19 A. He was under suicide watch. I'm not
20 sure what the difference is there. He was under
21 suicide watch which means check on him no less
22 than every two minutes -- 10 minutes.

23 Q. I'm going to show you this purple
24 document again, and I'm going to mark this as
25 Plaintiff's Exhibit D.

1 A. All right.

2 (Whereupon Exhibit D was marked for
3 identification and is attached hereto.)

4 BY MR. LITTLEJOHN, JR.:

5 Q. I'm going to show you this document
6 again. Do you see this?

7 A. Yes.

8 Q. Do you see, on the right side here,
9 where it says, "Select only one"?

10 A. Yes.

11 Q. What is your understanding as to alert
12 and watch?

13 A. Alert is a little higher level of
14 observation, I think, and watch is the 10-minute
15 tours.

16 Q. So you said the alert is the higher
17 level. What comes with the higher level?

18 A. I think that's when we put them in the
19 turtle suits and take stuff out of their cells,
20 thinking they might hurt themselves.

21 Q. I've never worked for a correctional
22 facility or a juvenile detention facility. What's
23 a turtle suit?

24 A. It's a big plastic suit that -- it
25 keeps -- they have to put it on. They can't take

1 it off. It will cover them up. It's like
2 plastic.

3 Q. Is it like the white --

4 A. No. No.

5 Q. Oh, okay. I didn't know.

6 A. It looks -- they call it a turtle suit
7 because it's green. It's just a big plastic suit
8 that they put on so they're covered up.

9 Q. So you're saying suicide alerts
10 receive a turtle suit and you also said belongings
11 are removed from their cell?

12 A. Anything they can hurt themselves
13 with. I think the sheets are taken -- most -- I
14 think they take everything out of there if I
15 remember correctly. I never had anybody on
16 suicide alert. I had a lot of people on watches.
17 When I went into different pods, I had seen them
18 in there.

19 Q. I'm going back to Exhibit C really
20 quickly. So you see Desmond Whisonant is -- the
21 box is checked for alert; is that correct?

22 A. Yes.

23 Q. All right. So as a juvenile inmate on
24 alert, Mr. Whisonant would have needed to be in a
25 turtle suit, correct?

1 A. If I remember correctly, yes.

2 Q. So on November 21st, 2020, he wasn't
3 in a turtle suit?

4 A. No.

5 Q. Did he have his belongings removed
6 from his cell?

7 A. Not that I could tell. He had his
8 blanket and stuff, and he was sitting on the bunk.

9 Q. I'm just showing you Plaintiff's
10 Exhibit A again. The video in which only you
11 appeared.

12 A. Uh-huh.

13 Q. Could you tell me the time on -- on
14 Plaintiff's Exhibit A, can you tell me the time?
15 Do you see it in the top right-hand corner?

16 A. 12:19.

17 Q. And is this from -- can you tell me
18 the date that's to the left of that?

19 A. 11-21-20.

20 Q. Okay. I just stopped it here at 12:19
21 and 49 seconds. Is that you to the bottom left of
22 that screen?

23 A. Looks like it.

24 Q. Is this you conducting a pod tour?

25 A. Yes.

1 Q. Now, is this a particular pod tour
2 that is specifically for Mr. Whisonant or a more
3 regular pod tour?

4 A. This is a regular pod tour.

5 Q. Okay. And what time does it say right
6 now in the top right-hand corner?

7 A. 12:20.

8 Q. And did that accurately depict -- is
9 it a fair representation of you on November 21st,
10 2020?

11 A. It looks like it.

12 Q. So I'm going back to what I have as
13 Plaintiff's Exhibit B; your handwritten log. In
14 this document, it states that pod tour begins at
15 12:19. And at 12:12 -- could you read your note
16 at 12:20?

17 A. "Pod tour completed. All appears safe
18 and secure."

19 Q. Does this note apply to Desmond
20 Whisonant?

21 A. Yes, it would -- that applied to
22 everybody in the pod.

23 Q. So is there a document that you would
24 have written on regarding your specific
25 observation of Desmond Whisonant on November 21st,

1 2020?

2 A. If I remember, it should have been the
3 purple form. The one that was there previously.
4 If there was one in there. I'm not sure when we
5 started using those purple forms, but if they were
6 in there, we would fill them out.

7 Q. Who reviews the handwritten suicide --
8 the suicide observation record? Who reviews those
9 for you?

10 A. I would think the sergeants, and
11 mental health may come in to take a look at them,
12 as far as I know.

13 Q. Sergeant Tiffany Parker Williams would
14 have reviewed your handwritten log and the suicide
15 observation record?

16 A. Yes.

17 Q. Do you remember discussing those logs
18 and records with Tiffany Parker Williams?

19 A. No.

20 Q. Did you ever discuss them with
21 Henrietta Saunders, who I believe you are saying
22 is Peaches?

23 A. Yeah -- no, I did not.

24 Q. Did you ever discuss those logs or
25 records with Akeem Comas?

1 A. No.

2 Q. Was Akeem Comas working on November
3 21st, 2020?

4 A. Honestly, I don't remember. He wasn't
5 in my pod and he wasn't in Weller's pod. If he
6 was there that day, I don't know where he was.

7 Q. What is your understanding as to how
8 often Desmond Whisonant should have been
9 checked?

10 A. Not to exceed every 10 minutes.

11 Q. So in the last video and the last clip
12 I just showed you that was at 12:20 -- you just
13 stated that you had to watch him every 10 minutes.
14 Could you tell me right now when you would have
15 needed to observe Desmond Whisonant again after
16 12:20?

17 A. Before 12:30.

18 Q. And did you do that, by chance, on
19 November 21st, 2020?

20 A. I would have to look at the log and
21 see, but I'm pretty sure I probably did.

22 Q. I'm still on Plaintiff's Exhibit A,
23 Mr. Sherald. The time is 12:35 p.m.

24 A. Uh-huh.

25 Q. Is that you coming into the frame

1 right now?

2 A. Yes.

3 Q. What time right now is at the top
4 right-hand corner?

5 A. 12:36.

6 Q. Mr. Sherald, do you see yourself in
7 this photo?

8 A. I do.

9 Q. Is that you in the bottom left-hand
10 corner?

11 A. Yes, it is.

12 Q. And what time is it?

13 A. 12:49.

14 Q. I believe this concludes you filling
15 in for Weller. So is this a regular pod tour or
16 is this a pod tour where you're going to check on
17 Mr. Whisonant?

18 A. This is a regular pod tour.

19 Q. Okay. So I just saw you touch those
20 two buttons as we were talking a little earlier.
21 Are these the buttons you're referring to as to
22 the type of log that is recorded?

23 A. Yes.

24 Q. The way you just looked into that
25 particular cell, would you say that you directly

1 observed --

2 A. I think I might have been talking to
3 one of the juveniles there.

4 Q. All right. Now, we pointed to, a
5 little earlier, where Desmond's cell was. Did you
6 directly observe Desmond's cell during that time?

7 A. Can you say that again? I didn't hear
8 you.

9 Q. Did you just directly observe
10 Mr. Desmond Whisonant in cell four?

11 A. Yes. On my last tour, he was just
12 sitting on his bunk.

13 Q. And by the last tour, are you saying
14 the one that was at 12:35?

15 A. The last one -- this one I just did at
16 12:49.

17 Q. Okay. So -- and remind me again which
18 cell you believe -- if you can remember, Mr.
19 Sherald, which cell you believe Mr. Whisonant was
20 in?

21 A. Third from the rear on the left.

22 Q. So again, did you just directly
23 observe that cell?

24 A. I did.

25 Q. I'm just going to go ahead and get the

1 timestamp of this and then review it later, if you
2 can. Did you see what time -- is that you in the
3 bottom left-hand corner, Mr. Sherald?

4 A. Yes.

5 Q. What time is on it?

6 A. 12:49.

7 Q. Does this accurately and fairly
8 represent you in pod five on November 21st, 2020?

9 A. Yes.

10 Q. And would you like to see any of the
11 four tours you did from 12:16 to 12:49? Would any
12 of those refresh your memory?

13 A. No, none.

14 Q. Okay. And during the 12:16 p.m. to
15 12:49 p.m., would there have been a time frame
16 where you interacted directly with Mr. Whisonant?

17 A. Would there have been a time?

18 Q. Yes, sir.

19 A. When you say interact, you mean talk
20 to him?

21 Q. Yes, sir.

22 A. If I did, it was just in passing.
23 Because usually, if I'm going by, I say, "Hey, are
24 you good?" But usually that's about it. I don't
25 think I -- if I said something, I don't remember

1 if he responded or --

2 Q. So is it your understanding that
3 directly observing inmates is just a general scan
4 of the pod?

5 MR. PERRIN: Objection to form. Asked
6 and answered. You can answer.

7 THE WITNESS: I'm -- yeah, just
8 observing what's going on in the cell.

9 BY MR. LITTLEJOHN, JR.:

10 Q. So is that you putting eyes inside
11 every individual cell?

12 A. Yes.

13 Q. And you haven't answered this: So on
14 November 21st, 2020, did you put your eyes in
15 Desmond Wisonat's individual cell?

16 A. Yes.

17 Q. Is there any training that you have to
18 undergo, as it relates to the Sheriff's office,
19 receiving new juvenile inmates as opposed to
20 juvenile inmates who have been there for a while?
21 Do you have to do anything different?

22 A. No, not to my recollection. No, they
23 were all done the same way.

24 Q. Aside from Weller's pod -- I want to
25 talk about that day in your pod.

1 A. Okay.

2 Q. What -- you stated a little earlier
3 that you're notified about an inmate being on
4 suicide alert or watch at roll call, correct?

5 A. Uh-huh.

6 Q. What other info is given to you,
7 generally, about the medical or mental health of
8 juvenile inmates?

9 A. Not a lot unless there's a problem.
10 Like someone needs to take a medication if their
11 mood changes and that type of stuff. Nothing
12 else.

13 Q. Do the mental health clinicians just
14 arrive on the floor when they want to or do you
15 have to request them to come to the cell or come
16 to a pod?

17 A. I can request them but they come in
18 and make regular rounds.

19 Q. So they make rounds as well?

20 A. Yes.

21 Q. What does it mean to be on a special
22 watch?

23 A. I am not familiar with a special
24 watch.

25 Q. Okay. In your experience with the

1 Mecklenburg County Sheriff's Office and your
2 previous experience with the correctional facility
3 in Ohio, why would an inmate be placed in a turtle
4 suit?

5 A. If they have -- I think, in my mind,
6 demonstrated that they have the potential to
7 seriously hurt themselves. And that determination
8 is made by the mental health professionals not
9 us.

10 Q. Right. But it is fair to say that you
11 are not a mental health clinician, correct?

12 A. That is correct.

13 Q. You didn't do any intake screening,
14 correct?

15 A. Right.

16 Q. But you are still responsible for the
17 custody of inmates, correct?

18 A. Right.

19 Q. So was your job to assure that they
20 are safe?

21 A. Yes.

22 Q. Why would the -- why would you need to
23 remove sheets or bed sheets from a juvenile
24 inmate's cell?

25 A. Why would you? I don't know if --

1 when they say to take those things -- again, it's
2 up to the mental health professionals. I don't
3 know what the requirements are for them to do it.

4 Q. What could bed sheets be used for?

5 A. To hurt themselves?

6 Q. Yes, sir?

7 A. They could hang themselves.

8 Q. How would an inmate go about fastening
9 a noose?

10 A. A -- honestly, I would not know. I've
11 never done that so I would not know.

12 Q. Could sprinkler systems be used to tie
13 a bed sheet?

14 A. I would have thought not. I didn't
15 think those things were in the walls that
16 strongly, to be perfectly honest with you, because
17 we have juveniles that remove them all the time.
18 Take the gauges off the --

19 Q. Pop sockets?

20 A. Yeah. So I didn't think they were
21 strong enough to hold somebody up, to be honest
22 with you.

23 Q. So the cells also have outlets,
24 correct?

25 A. Electrical outlets?

1 Q. Yes, sir.

2 A. No. No.

3 Q. Okay. So would you say that a -- a
4 juvenile inmate who has been placed on suicide
5 alert or suicide watch could use a bed sheet to
6 hang themselves?

7 A. I guess they could, yes. I guess they
8 could, yeah.

9 Q. Are you aware of how Desmond Whisonant
10 died on November 21st, 2020?

11 A. I am.

12 Q. What is your understanding of that?

13 A. That he hung himself from the fire --
14 the cage on the fire alarm. That's all I know.

15 Q. Do you know what he used to hang
16 himself?

17 A. Not really, no. He had on his
18 clothes. He could have used anything. I didn't
19 really get into the particulars of that.

20 Q. Which is why you would give a juvenile
21 inmate a turtle suit so they couldn't use their
22 clothes?

23 A. That's my understanding.

24 Q. Do you recall whether or not the
25 furniture was secured to the floor?

1 A. Inside the cell?

2 Q. Yes, sir.

3 A. They don't have any furniture. Just a
4 toilet, and a desk, and a cement slab with a
5 mattress pad on it. No other furniture.

6 Q. They don't have a chair for the desk
7 or anything?

8 A. They may have a stool. A little
9 plastic stool.

10 Q. And if they have a plastic stool, bed
11 sheets, and a fire alarm or pipe on the wall, are
12 those instruments that could be used to commit
13 suicide?

14 A. I guess they are. I mean, I'm sure
15 they are. I'm not an expert on suicides but
16 apparently they are.

17 Q. Have you done watches -- have you ever
18 relieved Dwight Weller while he was on lunch or
19 needed to take a break prior to the death of
20 Desmond?

21 A. Yes.

22 Q. Is that just typical? Is that
23 something officers --

24 A. It depends on how many people we had
25 that day. If we didn't have enough people in the

1 hallway, we would have to break ourselves. If
2 there were enough people in the hallway, somebody
3 would come in.

4 Q. Okay. Were you aware of any
5 inspection from the Department of Health and Human
6 Services on November 21st, 2020?

7 A. No.

8 Q. Before you left for Wells Fargo, were
9 there any other incidents that occurred or any
10 deaths at Jail North?

11 A. No, not while I was there.

12 Q. Did you leave for Wells Fargo because
13 of the closure of the detention facility?

14 A. No, I did not. My wife got me a job
15 over there.

16 Q. And why did you want to go to Wells
17 Fargo? You spoke a little earlier about how much
18 you love working with the youth and you were a
19 coach. Why did you leave for Wells Fargo?

20 A. My wife did not like me working there.
21 She thought I was a little old to be doing it. I
22 was 65 at the time and I'm 68 now. She thought I
23 was a little too old to be dealing with the
24 physicalities of the -- of dealing with the
25 juveniles. I loved working there.

1 Q. You said --

2 A. Okay.

3 Q. You said it was a time intensive
4 effort working with juveniles, right, as opposed
5 to working with adults -- in your previous
6 experience with adults?

7 A. Yes.

8 Q. Do you feel like there was adequate
9 staffing at Jail North?

10 A. We always had enough, on our shift at
11 least, to fill the pods. We could always use more
12 people but -- you know, I don't know what the --
13 the number of people they needed to have on staff.
14 I didn't concern myself with that.

15 Q. After the death of Desmond Whisonant,
16 did you become -- did you become aware of any
17 deaths that occurred at Jail Central?

18 A. No, I wasn't.

19 Q. Did they have to send any of the Jail
20 North officers to Jail Central?

21 A. You mean after the closure?

22 Q. No, sir, before the closure. So after
23 the death of Desmond Whisonant, did you ever have
24 to go to work at Jail Central?

25 A. No, I didn't. No.

1 MR. PERRIN: Michael, can we take a
2 break at an appropriate time?

3 MR. LITTLEJOHN, JR.: Yes, sir.

4 MR. PERRIN: Is now okay?

5 MR. LITTLEJOHN, JR.: Yes, sir.

6 (At 11:08 a break was taken.)

7 BY MR. LITTLEJOHN, JR.:

8 Q. Mr. Sherald, again, thank you so much
9 for your time today. You're not a defendant in
10 this case, right?

11 A. No.

12 Q. I do want to learn a little bit more
13 about the case you were previously a defendant in.
14 What kind of case was that?

15 A. It was a civil case. I owned a
16 recruiting business, and I had a contract with a
17 subcontractor. I didn't want to pay him because I
18 didn't think he did the work correctly, so we went
19 to court and I lost.

20 Q. And do you remember the specific
21 claims? Was it, like, a wage and hour claim? Was
22 it a breach of contract?

23 A. No. It was for the -- a contract --
24 we subbed part of the contract out. I had a
25 contract with the State of Ohio, and we

1 subcontracted out for them to supply STNEs, and
2 they didn't.

3 Q. So was the claim revolving around
4 misrepresentation of facts?

5 A. No, it was -- they didn't do the work.

6 Q. Have you talked to Mr. Weller since
7 the death of Desmond?

8 A. When he came back off -- he went on
9 sabbatical for a while. After that, I just asked
10 how he was doing. He was struggling a little bit.
11 That was about it. We didn't talk about anything
12 specific.

13 Q. When you say he was -- am I correct in
14 you saying he was pretty messed up about it? What
15 do you mean?

16 A. It affected him. He's one of the most
17 caring guys that I ever worked with it, and it
18 really bothered him that it happened on his watch.

19 Q. Did he say what he would have done
20 differently?

21 A. No. I don't think he could have done
22 anything differently because -- if you know
23 Weller, this guy is a machine, man. He does
24 everything by the book, by the numbers. He is one
25 of the most conscientious people I've ever met.

1 I've learned a lot from him. Just watching him
2 and how he managed his pods and interacted with
3 the kids.

4 Q. Did Weller train you at all?

5 A. No, he did not.

6 Q. All right. Wrapping up here. So on
7 November 21st, 2020, you were an employee of the
8 Mecklenburg County Sheriff's Office?

9 A. Yes.

10 Q. As far as your -- well -- and you were
11 a juvenile detention officer at that time or a
12 juvenile justice officer, correct?

13 A. Uh-huh.

14 MR. PERRIN: If you could answer
15 yes --

16 THE WITNESS: Yes.

17 BY MR. LITTLEJOHN, JR.:

18 Q. And part of your job was to ensure the
19 safety of inmates, correct?

20 A. Correct.

21 Q. And when an inmate is placed on
22 suicide alert or suicide watch, your job is to
23 keep the inmate alive, correct?

24 MR. PERRIN: Objection to form. You
25 can answer.

1 THE WITNESS: Yes.

2 BY MR. LITTLEJOHN, JR.:

3 Q. On November 21st, 2020, Weller was
4 responsible for Desmond?

5 MR. PERRIN: Objection to form. You
6 can answer that.

7 THE WITNESS: I imagine. As much as
8 he could control, yes.

9 BY MR. LITTLEJOHN, JR.:

10 Q. Were you responsible for the juvenile
11 inmates in your pod?

12 A. Yes.

13 Q. And it was your job to keep them
14 alive?

15 A. Yes.

16 Q. And does the same go for Weller in his
17 pod?

18 A. Yes.

19 Q. Okay. So that would include the
20 inmates in his pod, correct?

21 A. Yes.

22 Q. Okay. So Weller was responsible for
23 Desmond?

24 A. He was responsible for his safety, but
25 he can't be responsible for his actions.

1 Q. Weller can't be responsible for
2 Weller's actions or Desmond's actions?

3 A. He can't be responsible for Desmond's
4 actions.

5 MR. LITTLEJOHN, JR.: No further
6 questions at this time. I don't know if, Sean,
7 you want to cross, or Jake or --

8 MR. PERRIN: They may have questions
9 for us.

10 MS. TATE: I just have a few very
11 quick questions or -- Jake do you want to jump in?

12 MR. STEWART: Go for it if you're
13 ready.

14
15 DIRECT EXAMINATION

16 BY MS. TATE:

17 Q. All right. Bear with me just a
18 second. Mr. Sherald, my name is Jillian Tate. I
19 represent the defendants, Charles Moore and Tammy
20 Guess, in this case. Do you have any idea who
21 they are?

22 A. I do not.

23 Q. And I believe you testified you have
24 nothing to do with the transfer or intake of new
25 inmates into Jail North; is that correct?

1 A. That is correct.

2 Q. Or you didn't when you were in that
3 position over at Jail North?

4 A. Uh-huh.

5 Q. Okay. So is it typical for you to
6 ever speak with providers from the transferring
7 facility when an inmate goes from one facility to
8 Jail North?

9 A. No. No.

10 Q. Would you ever expect -- did you ever
11 expect, in that role, to speak with anybody from
12 the transferring facility?

13 A. No. No reason to.

14 Q. And I believe I know the answer to
15 this, based on those answers, but did you ever
16 speak with my clients, Tammy or Charles?

17 A. No, I did not.

18 Q. Would you have ever expected to speak
19 with Tammy or Charles?

20 A. No, I wouldn't.

21 Q. And in general, would information from
22 a transferring facility have affected your job or
23 what you did at Jail North?

24 A. Not to my knowledge. Maybe something
25 extreme like a guy that attacks officers. We had

1 a couple like that but that was only -- and that
2 wasn't from the facility. That was from
3 transportation.

4 Q. So is it typical for you to
5 communicate with transportation then?

6 A. I didn't communicate with them. That
7 information was given to us --

8 Q. Okay.

9 A. -- from the transportation.

10 Q. So for example, if an inmate were on
11 suicide watch or alert at a prior facility, before
12 moving to Jail North, would your knowledge of that
13 have changed your job at all?

14 A. No.

15 Q. Would it have changed the intake
16 procedures, to your knowledge, at Jail North?

17 A. Not to my knowledge, no. The
18 procedures would be the same.

19 MS. TATE: That's all I have. Thank
20 you so much.

21 THE WITNESS: All right.

22 MR. STEWART: Good afternoon, Mr.
23 Sherald. I'm representing two or three of the
24 other defendants. Sheriff Page, Detective Webster
25 and then Liberty Mutual. I don't have any

1 questions for you. I appreciate your time this
2 morning and this afternoon.

3 THE WITNESS: Thank you.
4

5 DIRECT EXAMINATION

6 BY MR. PERRIN:

7 Q. Mr. Sherald, I have a few questions.
8 Mr. Littlejohn asked you about the difference
9 between suicide alert and suicide watch. Do you
10 recall those questions?

11 A. Yes.

12 Q. And Mr. Whisonant was on suicide
13 alert; is that correct?

14 A. Yes.

15 Q. And what is the difference between --
16 you mention one has a turtle suit. Is that alert
17 or watch?

18 A. I thought it was alert but I believe
19 it's flip-flopped for watch.

20 Q. So if you're on suicide watch, you get
21 a turtle suit and things are removed from your
22 cell?

23 A. If that's determined by the mental
24 health provider.

25 Q. Versus alert, which Mr. Whisonant was

1 on, which is no turtle suit and removal of the
2 sheet; is that right?

3 A. Correct.

4 MR. PERRIN: Thank you.

5 MR. LITTLEJOHN, JR.: If you all don't
6 mind, I just have a couple of quick follow-up
7 questions.

8
9 REDIRECT EXAMINATION

10 BY MR. LITTLEJOHN, JR.:

11 Q. Mr. Sherald, you said a little earlier
12 you had nothing to do with the intake process at
13 Mecklenburg County Sheriff's Office, correct?

14 A. Yes, sir.

15 Q. You received no training with respect
16 to intake, correct?

17 A. Correct.

18 Q. A little earlier -- a moment ago, you
19 were asked about if you had received certain
20 information that would have affected your job, do
21 you remember that?

22 A. Yes.

23 Q. And you made reference or
24 hypothetically to if an inmate had been violent
25 previously somewhere else or had harmed correction

1 officers. Did you not just say that?

2 A. Yes.

3 Q. So regardless of if a juvenile -- if a
4 juvenile inmate was either on suicide alert or
5 suicide watch and you had learned that previously
6 before he arrived -- he or she arrived at your
7 facility, they had expressed suicidal ideations,
8 that would not have affected your job at the
9 Mecklenburg County Sheriff's Office?

10 A. It wouldn't change how I did the
11 checks, no. They're designed for that. So no, I
12 don't think it would have.

13 MR. LITTLEJOHN, JR.: Okay. Nothing
14 further from me.

15 MR. PERRIN: Anyone else?

16 MS. TATE: Nothing else from me.

17 MR. STEWART: I've got nothing else.

18 MR. PERRIN: Madam Court Reporter, he
19 will waive.

20 THE COURT REPORTER: Thank you. And
21 would anyone like a copy?

22 MR. PERRIN: We would like a copy.
23 This is Sean.

24 MS. TATE: We would. Just an e-trans
25 is fine.

1 MR. STEWART: Same for me. Thank you.
2 (At 12:18 a.m. the deposition
3 concluded.)

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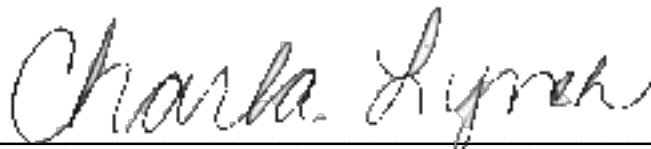
CERTIFICATE OF REPORTER

I, Charla Lynch, Court Reporter and Notary Public for the State of North Carolina at Large, do hereby certify:

That the foregoing deposition was taken before me on the date and at the time and location stated on Page 1 of this transcript; that the deponent was duly sworn to testify to the truth, the whole truth, and nothing but the truth; that the testimony of the deponent and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed; that the foregoing deposition as typed is a true, accurate, and complete record of the testimony of the deponent and of all objections made at the time of the examination to the best of my ability.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, this 6th of May, 2024,
at Camp Lejeune, Onslow County, North Carolina.



Charla N. Lynch,
Notary Public
State of North Carolina at Large
My Commission expires:
August 3, 2027

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